

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

O’Shea Chairse,

Civ. No. 23-355 (ECT/ECW)

Plaintiff,

v.

ORDER FOR ESI PROTOCOL

Minnesota Department of Human Services
and Jodi Harpstead, in her official
capacity as the Commissioner of the
Minnesota Department of Human
Services,

Defendants.

This case is before the Court on the Stipulation for ESI Protocol (Dkt. 58).

Having considered the Stipulation, **IT IS ORDERED** that following protocol for
Electronically Stored Information (ESI) is as follows:

Preservation and Litigation Hold

Plaintiff implemented a litigation hold in January 2023. Defendants implemented a
litigation hold in January 2023.

Production Format

- A. Electronically stored information (“ESI”) and paper documents must be produced
in a format consistent with loading into document review software, including
images, native files, text, associated metadata, and a load file.
 - a. If any party is unable to produce data in this manner, the party must provide
the information in native electronic format with unaltered metadata. In
addition, the producing party must also provide the documents in PDF
format. Both the native files and the corresponding PDFs should be named
by their Bates number, and each PDF must be stamped with a Bates number
and any relevant confidentiality designation.

- B. All document family groups, including email attachments and embedded files, must be produced together and children files must follow parent files sequentially in the document numbering.
- C. Any special viewing software necessary for video or audio will be provided with the video or audio files.

DATE: January 3, 2024

s/Elizabeth Cowan Wright
ELIZABETH COWAN WRIGHT
United States Magistrate Judge